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6 *Investment Group LLC Series 2679*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 WELLS FARGO BANK, N.A., a national
11 banking association,
Plaintiff,
12 vs.

Case No.: 2:16-cv-02363-JCM-GWF

13 LV REAL ESTATE STRATEGIC
14 INVESTMENT GROUP LLC SERIES 2679, a
Nevada limited-liability company; REDROCK
15 PARK HOMEOWNER'S ASSOCIATION, a
Nevada non-profit corporation; ATC
16 ASSESSMENT COLLECTION GROUP,
LLC, a Nevada limited-liability company;
17 Defendants.
18

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
OPPOSITIONS TO PENDING
MOTION FOR SUMMARY
JUDGMENT
(First Request)**

19
20 Defendant LV Real Estate Strategic Investment Group, LLC Series 2679 (hereinafter
21 **"LV Real Estate"**), Defendant Redrock Park Homeowner's Association (the "HOA"), and
22 Plaintiff Wells Fargo Bank, N.A. ("hereinafter **Wells Fargo**") (collectively, the "Parties"), by
23 and through their respective counsels of record, hereby submit the following first request for a
24 Stipulation and Order to extend the deadline for filing oppositions and commensurately
25 extending deadlines for filing replies in support of pending dispositive motions.
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1 WHEREAS, on December 13, 2017, this Court entered an order (ECF No. 32) setting a
2 briefing schedule for a dispositive motion based on the federal foreclosure bar.

3 WHEREAS on December 27, 2017, Wells Fargo filed its Motion for Summary
4 Judgment. ECF No. 33.

5 WHEREAS, oppositions to Wells Fargo's Motions for Summary Judgment are currently
6 due on or before January 24, 2018.

7
8 WHEREFORE, the Parties are in potentially final stages of a settlement negotiation and
9 therefore stipulate and agree to extend the deadlines for opposition to Wells Fargo's Motion
10 for Summary Judgment by 14 days to permit the parties time to attempt to complete such
11 settlement negotiations.

12 WHEREFORE, based on the foregoing,

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1 IT IS HEREBY STIPULATED AND AGREED that the deadline for oppositions to
2 Wells Fargo's Motions for Summary Judgment should be extended to February 7, 2018. And
3 the deadline for Wells Fargo to file any reply is 21 days from the date of any opposition, or
4 February 28, 2018. The Parties stipulate and agree to the foregoing in good faith. This
5 Stipulation is made for the benefit and convenience of the Parties and is not intended to delay
6 the proceedings in this case. This is the Parties' first request to extend the briefing schedule
7 established by the Court's December 13, 2017 order.
8

9 IT IS SO STIPULATED.

10 DATED: January 19, 2018.

11 SNELL & WILMER L.L.P.

12 /s/ Wayne Klomp

13 Wayne Klomp, Esq.

14 Nevada Bar No. 10109

15 John S. Delikanakis, Esq.

16 Nevada Bar No. 5928

17 Reno, Nevada 89501-1961

18 *Attorneys for Plaintiff Wells Fargo Bank, N.A.*

BRAUER, DRISCOLL, SUN AND
ASSOCIATES, LLC

/s/ Jeff Brauer

Jeff Brauer, Esq.

Nevada Bar No. 13834

Henderson, Nevada 89074

*Attorneys for Defendant LV Real Estate Strategic
Investment Group LLC*

16 TYSON & MENDES LLP

17 /s/ Christopher Lund

18 Thomas E. McGrath, Esq.

19 Nevada Bar No. 7086

20 Christopher Ammond Lund

21 Nevada Bar No. 12435

22 Las Vegas, Nevada 89123

23 *Attorneys for Defendant Redrock Park*

24 *Homeowner's Association*

Case No.: 2:16-cv-02363-JCM-GWF

IT IS SO ORDERED:

24 
UNITED STATES DISTRICT JUDGE,

26 DATED: January 31, 2018

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on January 25, 2018, I electronically filed the foregoing with the
3 Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF
4 system. Participants in the case who are registered CM/ECF users will be served by the
5 CM/ECF system.

6 /s/ Jeff Brauer

7 Jeff Brauer, Esq. an employee of BRAUER, DRISCOLL, SUN AND ASSOCIATES LLC
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